

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In re:

MISSISSIPPI RIVER CORPORATION

Debtor.

Case No. 10 - 51480

Chapter 11

Judge John E. Hoffman, Jr.

**NOTICE OF MOTION OF MISSISSIPPI RIVER CORPORATION, DEBTOR AND  
DEBTOR IN POSSESSION, FOR THE ENTRY OF AN ORDER AUTHORIZING THE  
ASSUMPTION OF CERTAIN EXECUTORY CONTRACTS  
WITH INTERNATIONAL PAPER COMPANY**

Mississippi River Corporation, Debtor and Debtor in Possession, has a filed a Motion (the "Motion") for the entry of an order, authorizing, but not directing, MRC to assume three (3) separate executory contracts with International Paper Company referred to as (i) the Recycled Pulp Supply Agreement, (ii) the Production and Consignment Agreement, as amended from time to time, and (iii) the License Agreement.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief sought in the Motion, then on or before **twenty-one (21) days from the date set forth in the certificate of service for the Notice of the Motion**, you must file with the Court a response explaining your position by mailing your response by regular U.S. Mail to: Clerk: United States Bankruptcy Court, 170 North High Street, Columbus, OH 43215, OR your attorney must file a response using the Court's ECF System.

The court must **receive** your response on or before the above date.

You must also send a copy of your response either by 1) the court's ECF System or by 2) regular U.S. Mail to:

Richard K. Stovall, Esq.  
ALLEN KUEHNLE STOVALL & NEUMAN LLP  
17 South High Street, Suite 1220  
Columbus, OH 43215-4100

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief without further hearing or notice.

Date of Certificate of Service for Notice of Motion: February 17, 2010

Respectfully submitted,

/s/ Richard K. Stovall

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*Proposed Counsel for Debtor and Debtor in  
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